

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**DV DIAMOND CLUB OF FLINT, LLC**  
**d/b/a Little Darlings; *et al.*,**

**Plaintiffs,**

**v.**

**UNITED STATES SMALL BUSINESS  
ADMINISTRATION; *et al.*,**

**Defendants.**

**Case No. 4:20-cv-10899**  
**Hon. Matthew F. Leitman**  
**Hon. David R. Grand**  
**by referral**

---

Bradley J. Shafer (P36604)  
Brad@BradShaferLaw.com  
Matthew J. Hoffer (P70495)  
Matt@BradShaferLaw.com  
Zachary M. Youngsma (P84148)  
Zack@BradShaferLaw.com  
**SHAFFER & ASSOCIATES, P.C.**  
3800 Capital City Blvd., Suite 2  
Lansing, Michigan, 48906  
517-886-6560 – Telephone  
*Attorneys for Plaintiffs*

---

James J. Gilligan  
James.gilligan@usdoj.gov  
**UNITED STATES DEPT. OF JUSTICE**  
Civil Division, Federal Prog. Bench  
1100 L Street, N.W., Room 11200  
Washington, D.C.  
202-514-3358 – Telephone  
Peter A. Caplan (P30643)  
Peter.Caplan@usdoj.com  
**MATTHEW SCHNEIDER**  
**UNITED STATES ATTORNEY**  
211 West Fort Street, Suite 2001  
Detroit, Michigan 48226  
313-226-9784  
*Attorneys for All Defendants*

---

**NOTICE OF FILING**

Plaintiffs respectfully bring to the Court's attention in advance of the status conference scheduled for July 29, 2021, at 12:30 p.m., the following two documents:

1. **Exhibit A** – Email correspondence from Defendant's counsel, Attorney Jim Gilligan, to Plaintiffs' counsel dated June 1, 2021, stating SBA will process Plaintiffs' First Draw Paycheck Protection Program loan forgiveness applications without reference to 13 C.F.R. § 120.110(p); and

2. **Exhibit B** – Court Minutes of Conference, Camelot Banquet Rooms, Inc. v. United States Small Bus. Admin., No. 2:20-cv-00601-LA (E.D. Wis. Jun. 20, 2021), ECF 48. Therein, the court stated SBA will not use 13 C.F.R. § 120.110(p) when evaluating the plaintiffs in that case's First Draw Paycheck Protection Program loan forgiveness applications.

Respectfully submitted,

Dated: July 16, 2021

/s/ Zachary M. Youngsma  
BRADLEY J. SHAFER (MI P36604)  
Brad@BradShaferLaw.com  
MATTHEW J. HOFFER (MI P70495)  
Matt@BradShaferLaw.com  
ZACHARY M. YOUNGSMA (MI P84148)  
Zack@BradShaferLaw.com  
**SHAFER & ASSOCIATES, P.C.**  
3800 Capital City Boulevard, Suite 2  
Lansing, Michigan 48906  
(517) 886-6560  
*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I certify that on July 16, 2021, I electronically filed the foregoing document with the Clerk of the Court using the ECF system, which will send notification of such filing to all counsel of record.

/s/ Zachary M. Youngsma  
Zachary M. Youngsma (P84148)  
**SHAFFER & ASSOCIATES, P.C.**